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March 3, 2008  
Via ECFS

Ms. Marlene H. Dortch, FCC Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW, Suite TW-A325  
Washington, DC 20554

**RE: EB Docket No. 06-36  
2007 CPNI Certification Filing  
International Communication Services, Inc. - Form 499 Filer ID 826847**

Dear Ms. Dortch:

Enclosed for filing is the 2007 CPNI Compliance Certification submitted on behalf of International Communication Services, Inc. This filing is submitted pursuant to 47 C.F.R. Section 64.2009(e) and in accordance with the Public Notice DA 08-171 issued January 29, 2008.

Any questions you may have concerning this filing may be directed to me at 470-740-3005 or via email to [mbyrnes@tminc.com](mailto:mbyrnes@tminc.com).

Sincerely,

Monique Byrnes  
Consultant to  
International Communication Services, Inc.

Attachments

*MB/sp*

cc: FCC Enforcement Bureau (provided via ECFS)  
Best Copy and Printing (via email to [FCC@BCPIWEB.COM](mailto:FCC@BCPIWEB.COM))  
F. Guelfi – International Comm Services  
file: International Comm Services - CPNI  
tms: FCCx0801

Annual 64.2009(e) CPNI Certification for: Calendar Year 2007  
Date Filed: March 3, 2008  
Name of Company covered by this certification: International Communication Services, Inc.  
Form 499 Filer ID: 826847  
Name of Signatory: Felipe Guelfi  
Title of Signatory: Chief Financial Officer

I, Felipe Guelfi, certify and state that:

1. I am the Chief Financial Officer of International Communication Services, Inc. and have personal knowledge of the International Communication Services, Inc. operating procedures as they relate to CPNI, and the Rules and Regulations of the Federal Communications Commission regarding CPNI.
2. I hereby certify that, to the best of my knowledge, information and belief, International Communication Services, Inc.'s operating procedures are adequate to ensure compliance with its CPNI obligations pursuant to Section 222 of the Communications Act of 1934, as amended, and the Commission's rules found at 47 CFR, Subpart U.
3. A further statement outlining the operating procedures and compliance of International Communication Services, Inc. is attached as Exhibit A, as required by 47 C.F.R. §64.2009(e).



Felipe Guelfi, Chief Financial Officer  
International Communication Services, Inc.

MARCH 3<sup>rd</sup> 2008

Date

Attachment A  
Statement of CPNI Procedures and Compliance

**International Communication Services, Inc.**

Calendar Year 2007

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**International Communication Services, Inc.**

**Statement of CPNI Procedures and Compliance**

International Communication Services, Inc. ("ICS" or "Company") operates solely as a provider of long distance prepaid debit card services sold via the internet or in retail stores not owned or operated by the Company. For retail services, the Company does not have any subscribed relationship with its customers and does not have any identifying information regarding its customers. Web-based sales do provide the Company an opportunity to build a subscribed relationship with its customers..

ICS does not use or permit access to CPNI for marketing purposes. ICS' marketing efforts are mass advertising, including internet advertising, and point of sale, and do not include the use of CPNI. Should ICS expand its business in the future to include the provision of services that involve CPNI, it will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

The Company however does maintain prepaid debit call detail records. The Company ensures that all access to call detail information is safeguarded from improper use or disclosure by employees and has in place methods to discover and protect against attempts by third parties to gain unauthorized access to this information. Call detail is not available and therefore is not disclosed at retail locations. Because the Company does not have any information regarding customers who purchase retail cards, the only authentication method available to the Company is to require that the customer provide the 10 digit PIN on the back of the card when calling for customer service.

Customers who purchase prepaid service via the internet are requested to establish a password on-line. Account information, including call detail, is available to customers of on-line service. In the event a customer loses or forgets the password established, the company has an authentication procedures to allow the customer to set up a new password. Information is only provided to customers via the email address established when service was initiated.



**International Communication Services, Inc.**

**Statement of CPNI Procedures and Compliance  
(Page 2)**

Call detail information is only provided to government agencies or law enforcement, in writing, as a result of a subpoena.

The Company has in place procedures to notify law enforcement in the event of a breach of customers' CPNI and should such an event occur, will record all breaches discovered and notifications made to the United States Secret Service and the FBI. Attempts will be made to the extent the Company has such information, to customers.

Because ICS does not have CPNI, it has not taken any actions against data brokers in the last year.

Because ICS does not have CPNI, it did not receive any customer complaints about the unauthorized release of CPNI in calendar year 2007.

The Company has not developed any information with respect to the processes pretexters are using to attempt to access CPNI.

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